

Jan 13, 2022

s/ Michael Longley

Deputy Clerk, U.S. District Court
Eastern District of Wisconsin

UNITED STATES DISTRICT COURT

for the
Eastern District of Wisconsin

In the Matter of the Search of

*(Briefly describe the property to be searched
or identify the person by name and address)*a USPS Parcel assigned tracking number
9405536895232807941561 currently located at HIDTA
Office in Milwaukee, WICase No. **22-M-321 (SCD)**

APPLICATION FOR A WARRANT BY TELEPHONE OR OTHER RELIABLE ELECTRONIC MEANS

I, a federal law enforcement officer or an attorney for the government, request a search warrant and state under penalty of perjury that I have reason to believe that on the following person or property *(identify the person or describe the property to be searched and give its location)*:

See Attachment A.

located in the Eastern District of Wisconsin, there is now concealed *(identify the person or describe the property to be seized)*:

See Attachment B.

The basis for the search under Fed. R. Crim. P. 41(c) is *(check one or more)*:

- ☒ evidence of a crime;
- ☒ contraband, fruits of crime, or other items illegally possessed;
- ☐ property designed for use, intended for use, or used in committing a crime;
- ☐ a person to be arrested or a person who is unlawfully restrained.

The search is related to a violation of:

<i>Code Section</i>	<i>Offense Description</i>
21 U.S.C. §§ 841(a)(1), 846 and 843(b).	Conspiracy to and distribution and possession with intent to distribute a controlled substance and unlawful use of a communication facility to distribution of a controlled substance.

The application is based on these facts:

Please see attached affidavit, which is hereby incorporated by reference.

☐ Continued on the attached sheet.☒ Delayed notice of 180 days *(give exact ending date if more than 30 days: 07/12/2022)* is requested under 18 U.S.C. § 3103a, the basis of which is set forth on the attached sheet.

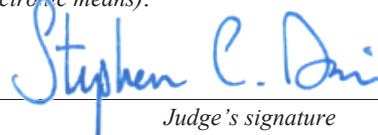
TYLER FINK

Digitally signed by TYLER FINK
Date: 2022.01.13 10:52:52 -06'00'*Applicant's signature*

Tyler Fink, Special Agent USPS OIG

Printed name and title

Attested to by the applicant in accordance with the requirements of Fed. R. Crim. P. 4.1 by
telephone *(specify reliable electronic means)*.

Date: 1-13-22*Judge's signature*City and state: Milwaukee, Wisconsin

Hon. Stephen C. Dries, U.S. Magistrate Judge

Printed name and title

**AFFIDAVIT IN SUPPORT OF
AN APPLICATION FOR A SEARCH WARRANT**

I, Tyler Fink, being first duly sworn, hereby depose and state as follows;

INTRODUCTION AND BACKGROUND

1. I am a Special Agent with the United States Postal Service (“USPS”) Office of Inspector General (“OIG”). I have been employed by the USPS OIG since December 2020.

2. The USPS OIG is an independent law enforcement, investigative, and oversight agency for the United States Postal Service and is charged under Title 18, United States Code, Section 3061 with the enforcement of laws governing use and movement of the United States mail, including, but not limited to, misuse of and fraudulent schemes involving the mail, crimes relating to mail fraud, identity theft, and narcotics trafficking.

3. I am currently assigned to the USPS OIG Milwaukee Office, Office of Investigations, Narcotics team, as well as being placed on the High Intensity Drug Trafficking Area (“HIDTA”) Opioid and Methamphetamine Task Force. The USPS OIG Narcotics team investigates employee misconduct involving narcotics, prohibited mailings, controlled substances, and other matters related to the Postal Service. The Milwaukee office’s team has intercepted numerous parcels, which were found to contain narcotics or proceeds of narcotics trafficking and other criminal activity.

4. I hold a Bachelor of Science degree in Mechanical Engineering from the University of Missouri – St. Louis. In 2014, I completed the Peace Officer Standards and Training certification at the St. Louis County and Municipal Police Academy while employed as a City of Creve Coeur Police Officer. While working as a Police Officer, I received extensive training in narcotics investigations. In 2017, I graduated from the United States Postal Inspection Service (“USPIS”) Basic Inspector Training program. I received advanced training by the USPIS in the

investigation of controlled substances or proceeds/payments being transported through the United States.

5. I have participated in numerous complex narcotics investigations which involved violations of state and federal controlled substances laws including Title 21, United States Code, Sections 841(a)(1) and 846 (possession with intent to distribute a controlled substance and conspiracy to possess with intent to distribute a controlled substance), and other related offenses. I have had both formal training and have participated in numerous complex drug trafficking investigations, including ones using wiretaps. More specifically, my training and experience includes the following:

- a. I have utilized informants to investigate drug trafficking. Through informant interviews, and extensive debriefings of individuals involved in drug trafficking, I have learned about the manner in which individuals and organizations distribute controlled substances in Wisconsin and throughout the United States;
- b. I have also relied upon informants to obtain controlled substances from dealers, and have made undercover purchases of controlled substances;
- c. I have participated in several search warrants where controlled substances, drug paraphernalia, and drug trafficking records were seized;
- d. I am familiar with the appearance and street names of various drugs, including marijuana, heroin, cocaine, cocaine base (unless otherwise noted, all references to crack cocaine in this affidavit is cocaine base in the form of crack cocaine), ecstasy, and methamphetamine. I am familiar with the methods used by drug dealers to package and prepare controlled substances for sale. I know the street values of different quantities of the various controlled substances;
- e. I am familiar with the language utilized over the telephone to discuss drug trafficking, and know that the language is often limited, guarded, and coded;
- f. I know that drug traffickers often use electronic equipment and wireless and land line telephones to conduct drug trafficking operations;
- g. I know that drug traffickers commonly have in their possession, and at their residences and other locations where they exercise dominion and control, firearms, ammunition, and records or receipts pertaining to such;
- h. I have assisted in court authorized wiretaps and have been trained to operate the equipment utilized to conduct such operations;
- i. I know that drug traffickers often put their telephones in nominee names in order to distance themselves from telephones that are utilized to facilitate drug trafficking; and
- j. I know that drug traffickers often use drug proceeds to purchase assets such as vehicles, property, and jewelry. I also know that drug traffickers often use

nominees to purchase and/or title these assets in order to avoid scrutiny from law enforcement officials.

6. Based on my training and experience, I also know that the “dark web” refers to any Internet content, which exists on “darknets,” overlay networks that require specific software, configurations, or authorization. The most commonly known “darknet” is The Onion Router (TOR). The “darknet” uses a series of websites to anonymize internet traffic, making it difficult for law enforcement to track a user’s Internal Protocol address. To further criminal activities, those distributing illicit goods (including controlled substances) often use “darknet markets” (DNM), commercial websites that operate on darknets, to advertise and sell the illicit goods. Drug traffickers are increasingly using DNMs to distribute and purchase controlled substances and materials used to manufacture and distribute controlled substances.

7. Drug traffickers using DNMs often use enhanced cryptocurrency, such as Bitcoin, to protect their identities. Bitcoin is a decentralized digital currency without a central bank or single administrator. Payments are sent from user-to-user on the peer-to-peer bitcoin network without the need for intermediaries. DNM vendors often use third-party postage services, such as EasyPost, to add additional layers of anonymity to their transactions. These services allow their customers to purchase postage using cryptocurrency.

8. I have been the affiant on over 80 warrants in federal court. Based on my training, personal experience, on the job training, and working with other USPS OIG Special Agents and Wisconsin HIDTA drug task force officers, I know narcotics, drugs, paraphernalia, controlled substances, and moneys associated with the sale of narcotics, drugs, and controlled substances are sent through the USPS system, and I am familiar with many of the methods used by individuals who attempt to use the USPS to illegally distribute controlled substances.

PURPOSE OF AFFIDAVIT

9. This affidavit is made in support of a search warrant for the **SUBJECT PARCEL** (described below) for items which constitute the fruits, instrumentalities, and evidence of violations of Title 21, United States Code, Sections 841(a)(1), 843(b), and 846. To seize: any controlled substance, and any paraphernalia associated with the manufacture and distribution of controlled substances including packaging materials and containers to hold controlled substances; proceeds of drug trafficking activities, such as United States currency, money orders, bank checks, precious metals, financial instruments; and drugs or money ledgers, drug distribution or customer lists, drug supplier lists, correspondence, notations, logs, receipts, journals, books, records, and other documents noting the price, quantity, and/or times when controlled substances were obtained, transferred, sold, distributed, and/or concealed.

PARCEL TO BE SEARCHED

8. This affidavit is made in support of an application for a search warrant for USPS Priority Mail parcel 9405536895232807941561 ("**SUBJECT PARCEL**"). The **SUBJECT PARCEL** is approximately an 11" x 7.5" x 7" USPS parcel weighing approximately 3 lbs. 0 oz. The shipping label for the **SUBJECT PARCEL** indicates it is from "Aaron Blau, 1245 S 3rd St, Alhambra CA 91801". The **SUBJECT PARCEL** bears a handwritten label addressed to "Raymond Starr, 3333 S Clement Ave Apt 9, Milwaukee WI 53207-2869". The **SUBJECT PARCEL** was postmarked on January 3, 2022 in Alhambra, California 91801. The postage paid was \$11.92.

PROBABLE CAUSE

9. I review Postal Service records and labels of parcels delivered to the state of Wisconsin from source narcotics areas or sent to those source narcotics areas from Wisconsin. I

do this because I know, based on my training and experience, drug traffickers will sometimes use USPS Priority Mail service, which is the USPS two-day delivery product. Based on my training and experience with the USPS OIG, I know drug traffickers use Priority Mail delivery service because of its reliability and the ability to track the article's progress to the intended delivery point. In my training and experience, traffickers will often use fictitious names and/or addresses as well as incomplete names and addresses in an attempt to hide their trafficking efforts from law enforcement.

10. On January 5, 2022, I was conducting routine parcel screening at the Bay View Post Office, located at 1603 E. Oklahoma Avenue, Milwaukee, Wisconsin 53207, when I deemed the **SUBJECT PARCEL** to be suspicious.

11. The shipping label on the **SUBJECT PARCEL** indicated it was paid for using cryptocurrency on EasyPost, a third-party postage service. Based on my training and experience and on information provided by reliable law enforcement sources, I know that individuals involved in the trafficking of illicit drugs are increasingly using "darknet markets" to distribute and purchase narcotics and the materials used to manufacture and distribute narcotics and often take advantage of the anonymity of enhanced cryptocurrency and third-party postage services.

Accurint database query and K9 alert to the SUBJECT PARCEL

12. The Accurint database is a public records product which is designed for law enforcement officers in locating subjects and witnesses, verifying identities of individuals, and gathering background information for use in investigations. A search of the Accurint database revealed no person by the name of Raymond Starr currently lives, or has lived, at 3333 S. Clement Avenue, Apartment 9, Milwaukee, Wisconsin 53207. The Accurint database, as well as the Wisconsin Department of Transportation, shows a Ramon Starr lives at this address.

13. A search of the Accurint database revealed no person by the name of Aaron Blau currently lives, or has lived, at 1245 S 3rd Street, Alhambra, California 91801.

14. Based on my training and experience, I am aware California is a source area for controlled substances. As such, controlled substances are frequently transported from California via the USPS, and the proceeds from the sale of the controlled substances are frequently returned to California via the USPS and/or other means. These proceeds are generally in large amounts of money, oftentimes over \$1000.

15. On January 5, 2022, I met with Wisconsin State Patrol Trooper Derek Bergum (“Trooper Bergum”) and his canine “SMOKEY” at the HIDTA office, located at 801 W Michigan Street, Milwaukee, WI 53233. Together, Trooper Bergum and SMOKEY are a certified drug detection team. Trooper Bergum informed me when SMOKEY detects the odor of a controlled substance that he is trained to detect, SMOKEY sits at the location where the odor of the controlled substance is, and this sitting is called an “indication”. Trooper Bergum and SMOKEY have received four weeks (160 hours) of training by Wisconsin State Patrol, Sergeant Todd Brehm, (deploying and utilizing a drug detection canine). This four-week training program is modeled after the North American Police Work Dog Association (NAPWDA). Together, Trooper Bergum and SMOKEY are a certified Police Canine Narcotic Detection Team accredited through the NAPWDA, in the detection of heroin, cocaine, marijuana, methamphetamine and other controlled substances made with like components. Trooper Bergum and SMOKEY were certified as a Police Canine Narcotic Detection Team by NAPWDA Master Trainers on November 2nd, 2021. SMOKEY has indicated to the presence of the controlled substance he is trained to detect over 150 times in the past which includes training. In each indication, drugs SMOKEY is trained to find have been recovered or a drug nexus has been found.

16. On January 5, 2022, I placed the **SUBJECT PARCEL** on the ground in the HIDTA office along with four other similarly sized empty parcels. Trooper Bergum advised SMOKEY located and indicated to the **SUBJECT PARCEL**. Trooper Bergum informed me SMOKEY's indication denoted the presence of controlled substances or other items, such as proceeds of controlled substances, which have been recently contaminated with, or associated with the odor of one or more controlled substances that SMOKEY is trained to detect.

17. Based upon the information as outlined in this affidavit, I believe there is probable cause to indicate the contents of the **SUBJECT PARCEL** is drug related, and thus constitutes the fruits, instrumentalities, and evidence of violation of Title 21, United States Code, Sections 841(a)(1), 843(b), and 846.

18. Because this affidavit is submitted for the limited purpose of securing authorization for a search warrant, I have not included each and every fact known to me concerning this investigation. I have set forth only the facts that I believe are essential to establish the necessary foundation for the requested search warrant.

19. The **SUBJECT PARCEL** is currently secured at the HIDTA Office.

ATTACHMENT A
Property to be searched

The property to be searched is USPS Priority Mail parcel 9405536895232807941561 (“**SUBJECT PARCEL**”). The **SUBJECT PARCEL** is approximately an 11” x 7.5” x 7” USPS parcel weighing approximately 3 lbs. 0 oz. The shipping label for the **SUBJECT PARCEL** indicates it is from “Aaron Blau, 1245 S 3rd St, Alhambra CA 91801”. The **SUBJECT PARCEL** bears a handwritten label addressed to “Raymond Starr, 3333 s Clement Ave Apt 9, Milwaukee WI 53207-2869”. The **SUBJECT PARCEL** was postmarked on January 3, 2022 in Alhambra, California 91801. The postage paid was \$11.92.

ATTACHMENT B
Property to be seized

All fruits, instrumentalities, and evidence of violations of Title 21, United States Code, Sections 841(a)(1), 843(b), and 846. To seize: any controlled substance, and any paraphernalia associated with the manufacture and distribution of controlled substances including packaging materials and containers to hold controlled substances; proceeds of drug trafficking activities, such as United States currency, money orders, bank checks, precious metals, financial instruments; and drugs or money ledgers, drug distribution or customer lists, drug supplier lists, correspondence, notations, logs, receipts, journals, books, records, and other documents noting the price, quantity, or times when controlled substances were obtained, transferred, sold, distributed, or concealed.